

MARSHALL DENNEHEY
WARNER COLEMAN & GOGGIN

ATTORNEYS-AT-LAW WWW.MARSHALLDENNEHEY.COM

A PROFESSIONAL CORPORATION

Wall Street Plaza. 88 Pine Street, 21st Floor · New York, NY 10005
(212) 376-6400 · Fax (212) 376-6490

Direct Dial: 212-376-6433

Email: mbjohnson@mdwcg.com

PENNSYLVANIA
Allentown
Doylestown
Erie
Harrisburg
King of Prussia
Philadelphia
Pittsburgh
Scranton

NEW JERSEY
Cherry Hill
Roseland

DELAWARE
Wilmington

OHIO
Cincinnati
Cleveland

FLORIDA
Ft. Lauderdale
Jacksonville
Orlando
Tampa

NEW YORK
Long Island
New York City
Westchester

August 16, 2015

The Honorable Brian M. Cogan
United States District Court
Eastern District of New York
225 Cadman Plaza South
Brooklyn, NY 11201

Re: Huebner v. Midland Credit Management, Inc. et al., Case No. 14-cv-06046BMC
Request for Extension of Time to Conduct Deposition of Corporate
Representative

Dear Judge Cogan:

I represent Defendant Midland Credit Management, Inc. and Midland Funding, LLC ("Midland") in this matter and I write to request an extension of time for Plaintiff to conduct the deposition of Midland's corporate representative.

On August 10, 2015, Plaintiff's counsel informed me that Plaintiff wishes to depose Midland's corporate representative in person in the Eastern District of New York. Midland's representative has agreed to come to the Eastern District to be deposed, however, she is not able to appear before the present deadline to complete depositions, which is August 24, 2015. Therefore, Midland respectfully requests an extension of time, through September 24, 2015, for Plaintiff to depose Midland's corporate representative. The deposition of Plaintiff is set to take place on August 17, 2015, thus no extension request is expected in connection with that matter.

On July 21, 2015, the Parties jointly requested an extension of time to complete discovery, which was granted in part and denied in part, extending some of the discovery deadlines.

Regarding the present request, Plaintiff's counsel stated that Plaintiff would only consent to this extension request if Midland agreed to allow Plaintiff to book Midland's representative's travel arrangements, including the flight and hotel accommodations. Midland responded that it would make appropriately modest travel and lodging

The Honorable Brian M. Cogan

August 16, 2015

Page 2

arrangements and refused Plaintiff's request, as Midland uses its own travel agents for such matters. Plaintiff's counsel again stated that he will not provide consent.

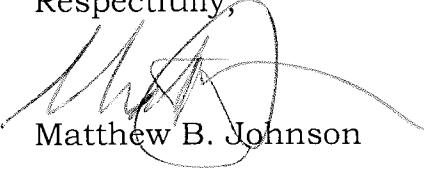
Presently pending are the following deadlines:

Plaintiff's Motion for Class Certification (if any): September 1, 2015

Fact Discovery to be completed: October 1, 2015

Midland proposes extending these deadlines by one month each, to October 1, 2015 and Monday, November 2, 2015, respectively. Midland requested Plaintiff's counsel's consent to this portion of the request but did not receive a response. I note that I issued the request on a Sunday evening, though I had been corresponding with Plaintiff's counsel shortly before sending the request.

Respectfully,



Matthew B. Johnson

Cc (via ECF): All counsel of record